

REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 1-22 are pending in this application.

Rejection Under 35 U.S.C. §103:

Claims 1-16 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Donohue et al (U.S. '480, hereinafter "Donohue") in view of Christensen et al (U.S. '543, hereinafter "Christensen"). Applicant respectfully traverses this rejection.

In order to establish a prima facie case of obviousness, all of the claim limitations must be taught or suggested by the prior art. The combination of Donohue and Christensen fails to teach or suggest all of the claim limitations. For example, the combination fails to teach or suggest "each content file being stored in a directory of the computer file system...and applying the or each template file associated with a given directory to each content file stored in that directory, wherein the respective directory in which each content file is stored determines which of the or each template file is applied," as required by independent claim 1 and its dependents. Similar comments apply to independent claims 5, 13 and 14 and their respective dependents. The combination of Donohue and Christensen also fails to teach or suggest in a computer file system storing both one or more content files and one or more template files and being divided into directories, locating one or more content files, each content file being stored in a directory of the computer file system, and applying the or each template file

associated with a given directory to each content file stored in that directory, as required by independent claims 15 and 16 and their respective dependents.

The Advisory Action apparently indicates that col. 4, lines 59-62 and col. 5, lines 24-31 of Donohue (see continuation page of the Advisory Action) teaches or suggests the above claimed features. Applicant respectfully disagrees. Col. 4, lines 59-62 of Donohue states, “The data source may comprise any conventional type of database and database management system, provided the content stored in the database represents or is reducible to name/value pairs.” Col. 5, lines 24-31 of Donohue states the following:

“In accordance with still further aspects of the invention, a method is described for automatically inheriting templates within a directory structure on the web server. The method involves designing and storing a plurality of document templates on the web server in a hierarchical directory structure, each document template corresponding to one of a plurality of possible documents which may be requested by users.”

The above portions of Donohue, either separately or taken together, fail to teach or suggest the above claimed features. In particular, these portions of Donohue disclose that the data source, which provides first content in a form representing or reducible to names/values, may comprise any conventional type of database and database management system, and that document templates are stored in a directory structure of a web server. There is no teaching or suggestion that, for example, a particular template is specifically associated with any directory of the “conventional type of database and database management system” forming the data source of name/value pairs. Even if the data source 12 and templates 24 are stored on the same server 10, there is again no teaching or suggestion that one of the templates 24 is associated with a specific directory

of the data source 12 formed by the “conventional type of database and database management system.” Moreover, “documents”, as characterized by the final Office Action, are not even stored in the data source 12 as discussed below.

These portions of Donohue also fail to recognize the benefits resulting from the above claimed features. These benefits include, for example, template files being associated not with particular content files, but with a directory in which the content file is stored. Consequently, the template chosen to be applied to a given content file may be selected by associating a chosen template with the directory in which the content file is stored or by moving the content file into a directory with which that chosen template is associated. If a different template is desired for application, the different template may simply be associated with that directory in which the content file is stored or the content file may simply be moved to a different directory with which the new template is associated. (See page 4, line 21 to page 5, line 2 of the specification).

Donohue relates to a method and system for delivering customized documents over the Internet. A web server 10 stores both a data source 12, comprising a list of names and corresponding values, and document templates 24 which include dynamic tags and flow directives. Typically, the server 10 receives requests over the Internet, the requests identifying desired documents to be delivered. Based on the desired document, the server 10 selects a document template 24, populates it with data from data source 10, and delivers the newly-generated document to the client computer 2 that sent the request.

The final Office Action alleges “The ‘content files’ corresponds to the ‘documents’ that stored in the data source 12 in Fig. 1 (col. 7 lines 35-44).” (See page 3,

lines 1-2 of the final Office Action). Applicant disagrees with the allegation that the claimed term “content files” corresponds to the term “documents” of Donohue. The claimed term “content files” refers to the information-bearing content files that are stored in directories and to which are applied template files associated with those directories. In contrast, the term “document” in Donohue refers to the output generated when a document template is populated with data from data source 12. This output is personalized depending on the identity of the requesting party. “Documents” are not stored in data source 12 since they do not actually exist until the template file is activated and populated with data from data source 12. Once generated, documents are sent to the client computer that requested them. The passages of Donohue (e.g., see col. 5, lines 52-67) identified in the final Office Action support this point. The term “content files” recited in the claims therefore does not correspond to the term “documents” disclosed by Donohue. Contrary to the allegations of the final Office Action, Donohue therefore fails to teach “locating one or more content files, each content file being stored in a directory of the computer file system.”

The final Office Action alleges that col. 5, lines 25-31 of Donohue discloses “associating one or more template files with each directory in which at least one content file is stored.” (See page 3, lines 3-4 of the final Office Action). Applicant respectfully disagrees with this allegation. While this portion of Donohue does refer to storing document templates in a directory structure, there is no disclosure of one or more content files being stored in a directory structure.

The final Office Action alleges that col. 7, lines 15-22 of Donohue discloses the claim limitation of “applying the or each template file associated with a given directory to each content file stored in that directory.” (See page 3, lines 7-8 of the final Office Action). The final Office Action further alleges that col. 10, lines 43-48 of Donohue discloses the claim limitation “wherein the respective directory in which each content file is stored determines which of the or each template file is applied.” (See page 3, lines 9-10 of the final Office Action). Applicant respectfully disagrees with each of these allegations. As explained above, Donohue fails to disclose that one or more content files are stored in a directory and that template files are associated with each directory in which a content file is stored. Col. 7, lines 15-22 and col. 10, lines 43-48 identified by the final Office Action simply confirm the generation of documents using templates 24 populated with data from data source 12.

Donohue therefore discloses a data source 12 which stores name and value pairs. (See col. 7, lines 34-58). While Donohue discloses a directory system, only the templates themselves (not content data which is stored in data source 12) are stored in the directory system. Thus, when a user requests an HTML file by entering a URL specifying an HTML file by its location within a directory system, that file does not actually exist at that time. Instead, the system in Donohue looks for a template 24 stored in the directory specified in the URL and separately looks for data to be used by the template from data source 12. To identify the correct data to use from data source 12, some mechanism is used other than the directory of templates 24. Two exemplary mechanisms are described at col. 10, lines 31-34, which relates to using the internet address of a user or by having

the registered user log-in. This presumably yields a user id from which the rest of the data associated with that user may be recovered. The user data found in this way is placed into a “container” which is passed to the template which parses the container to generate, dynamically, an HTML file. This HTML file is then finally passed to the requesting user as a document. Thus, at no time is a template file applied to a content file stored in that directory.

The final Office Action suggests that it would have been obvious to substitute the name-value list (stored in the data source of Donohue) with metadata content files stored in Christensen. This suggested modification would simply result in one list (the content file in Christensen) being substituted in place of another (the name-value list of Donohue). Even assuming arguendo that the teachings of Christensen and Donohue were combined as proposed by the final Office Action, the combination would still fail to teach or suggest locating content files, each content file being stored in a directory of a computer file system, associating one or more template files with each directory in which at least one content file is stored, and applying the or each template file associated with a given directory to each content file stored in that directory.

Accordingly, Applicant submits that claims 1-16 are not “obvious” over Donohue in view of Christensen and respectfully requests that the rejection of these claims under 35 U.S.C. §103 be withdrawn.

New Claims:

New claims 17-22 have been added to provide additional protection for the invention. Since claims 17, 18, 19, 20, 21 and 22 depend from independent claims 1, 5,

BAGLEY et al.
Application No. 09/889,349
February 24, 2005

13, 14, 15 and 16, respectively, Applicant submits that these claims are allowable for at least the reasons discussed above with respect to these base claims.

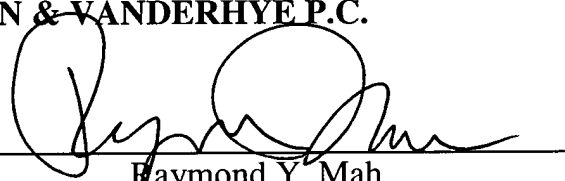
Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____


Raymond Y. Mah
Reg. No. 41,426

RYM:sl
1100 North Glebe Road, 8th Floor
Arlington, VA 22201-4714
Telephone: (703) 816-4044
Facsimile: (703) 816-4100